

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. _____</b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: _____</b>
<b>KIEME PURDY,</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>a/k/a “Ki,”</b>	<b>:</b>	<b>18 U.S.C. § 371 (conspiracy to commit</b>
<b>ANTHONY MARSETT,</b>	<b>:</b>	<b>armed bank robbery - 1 count)</b>
<b>a/k/a “Ant,”</b>	<b>:</b>	<b>18 U.S.C. § 2113(d) (armed bank robbery</b>
<b>DANIEL SMITH,</b>	<b>:</b>	<b>- 1 count)</b>
<b>a/k/a “D”</b>	<b>:</b>	<b>18 U.S.C. § 924(c)(1) (carrying and using</b>
	<b>:</b>	<b>a firearm during a crime of violence - 1</b>
	<b>:</b>	<b>count)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>
		<b>Notice of forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. At all times material to this indictment, Citizens Bank, located at 9218 Frankford Avenue, Philadelphia, Pennsylvania (“Citizens Bank”), was insured by the Federal Insurance Deposit Corporation.

2. From on or about July 15, 2007, until on or about July 18, 2007,  
defendants

**KIEME PURDY,  
    a/k/a “Ki,”  
ANTHONY MARSETT,  
    a/k/a “Ant,” and  
DANIEL SMITH,  
    a/k/a “D,”**

conspired and agreed, together with another person unknown to the grand jury, to commit an offense against the United States, that is, to knowingly and unlawfully commit armed bank robbery, in violation of Title 18, United States Code, Section 2113(d).

### **MANNER AND MEANS**

3. It was part of the conspiracy that defendants KIEME PURDY, ANTHONY MARSETT, and DANIEL SMITH, and a person unknown to the grand jury (“person #1”), planned and executed a gun-point robbery of Citizens Bank in Philadelphia, Pennsylvania, during which they stole approximately \$43,400.

### **OVERT ACTS**

In furtherance of the conspiracy and to effect the objects of the conspiracy, the defendants and person #1 committed the following overt acts, among others, in the Eastern District of Pennsylvania:

1. On or about July 15, 2007, defendants KIEME PURDY, ANTHONY MARSETT, and DANIEL SMITH drove to the Citizens Bank and agreed to rob it.

On or about July 18, 2007:

2. Defendants KIEME PURDY, ANTHONY MARSETT and DANIEL SMITH, and person #1, drove together to the Citizens Bank.

3. While person #1 waited in the getaway car, defendants KIEME PURDY, ANTHONY MARSETT and DANIEL SMITH entered the Citizens Bank. Defendant MARSETT pointed a sawed-off shotgun at bank employees, and defendant SMITH pointed a pistol at bank employees and ordered them to get on the floor. Defendant PURDY ordered one of the tellers to fill a bag with money from a bank vault, then to give him money from the teller drawers, and stole approximately \$43,400 in cash.

4. Defendants KIEME PURDY, ANTHONY MARSETT and DANIEL SMITH fled from the bank to the getaway car, where person #1 was waiting for them. After defendants PURDY, MARSETT and SMITH entered the getaway car, person #1 drove off.

All in violation of Title 18, United States Code, Section 371.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 18, 2007, in Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, defendants

**KIEME PURDY,  
a/k/a “Ki,”  
ANTHONY MARSETT,  
a/k/a “Ant,” and  
DANIEL SMITH,  
a/k/a “D,”**

knowingly and unlawfully, by force and violence, and intimidation, took, and aided and abetted the taking of, lawful currency of the United States, that is, approximately \$43,400, from employees of the Citizens Bank, 9218 Frankford Avenue, belonging to, and in the care, custody, control, and management and possession of the Citizens Bank, the deposits of which were and are insured by the Federal Deposit Insurance Corporation, and in so doing, knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of the Citizens Bank and other persons, by use of dangerous weapons, that is, a handgun and a sawed-off shotgun.

In violation of Title 18, United States Code, Sections 2113(d) and 2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about July 18, 2007, in Philadelphia, Pennsylvania, in the Eastern District of Pennsylvania, defendants

**KIEME PURDY,  
a/k/a “Ki,”  
ANTHONY MARSETT,  
a/k/a “Ant,” and  
DANIEL SMITH,  
a/k/a “D,”**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, loaded Ruger .45 caliber pistol, serial number 663-01259, and a loaded 12 gauge Herrington and Richardson sawed-off shotgun, serial number AZ536229, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, conspiracy to commit armed bank robbery, in violation of Title 18, United States Code, Section 371, and armed bank robbery, in violation Title 18, United States Code, Section 2113(d).

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

As a result of the violation of Title 18, United States Code, Section 924(c), set forth in this indictment, defendants

**KIEME PURDY,  
a/k/a “Ki,”  
ANTHONY MARSETT,  
a/k/a “Ant,” and  
DANIEL SMITH,  
a/k/a “D,”**

shall forfeit to the United States of America the firearms and ammunition involved in the commission of such offense, including, but not limited to:

- 1) a Ruger .45 caliber pistol with serial number 663-01259, loaded with four rounds of ammunition; and
- 2) a Herrington and Richardson 12 gauge shotgun with serial number AZ536229, loaded with one round of ammunition.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

**A TRUE BILL:**

\_\_\_\_\_  
**FOREPERSON**

\_\_\_\_\_  
**PATRICK L. MEEHAN**  
**United States Attorney**